

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05-10343-GAO

ROBERT F. KEESE III,)
)
Plaintiff)
)
V.)
)
M/V PANORMOS, her engines, tackle,)
machinery, appurtenances, apparel and)
freight, etc., <i>in rem</i> , and MARMARAS)
NAVIGATION, LTD., <i>in personam</i> ,)
)
Defendants)

**JOINT MOTION TO AMEND SCHEDULE FOR
DISCOVERY AND MOTION PRACTICE**

The parties to this action hereby jointly move that the plan for discovery and motion practice be amended to reflect the dates set forth below for the completion of identified tasks:

1. completion of all factual discovery, including depositions, by **August 21, 2006**;
2. plaintiff to designate trial experts and disclose information required by Rule 26(b)(4)(A)(i) by **September 1, 2006** and the defendants will do so by **September 15, 2006**;
3. the parties will complete expert discovery, including expert depositions, by **October 31, 2006**.

As grounds for this motion, the parties state that written discovery in the form of interrogatories, requests for production of documents, and requests for

admissions have been served and that counsel are working diligently and cooperatively to complete all such written discovery. Defendants are foreign entities, and the parties believe that the requested amendment of the discovery schedule will provide them with the time required to complete all necessary factual and expert discovery. This motion is not interposed for the purpose of delay.

Respectfully submitted,

By their attorneys,

“/s/ Michael J. Rauworth”

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